



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

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Order Instituting Rulemaking Regarding Policies,)
Procedures and Rules for the California Solar)
Initiative, the Self-Generation Incentive Program)
and Other Distributed Generation Issues.)

R.06-03-004
(Filed March 2, 2006)

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON OPINION MODIFYING DECISION 06-01-024 TO INCREASE SYSTEM SIZE
ELIGIBILITY

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Dated: **July 17, 2006**

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I.

INTRODUCTION

Pursuant to Article 19 of the California Public Utility Commission's (Commission) Rules of Practice and Procedure, Southern California Edison Company submits this Reply to comments on the Opinion Modifying Decision 06-01-024 To Increase System Size Eligibility (Draft Decision). SCE participated in the Joint Comments of the Self Generation Incentive Program Administrators supporting the Draft Decision's modification of the rules concerning system size eligibility. These Reply Comments are limited to responding to arguments that are outside the scope of the Draft Decision made by the Californians for Renewable Energy (CARE).

II.

REPLY COMMENTS

In addition to concurring with the Draft Decision's modification of the rules concerning system size eligibility, CARE argues that the Commission should consider eliminating the system size cap altogether. CARE also argues that the Commission should require utilities to "compensate" PV system owners for solar generation beyond the monetary benefits already

provided through Net Energy Metering (NEM) and the incentives provided through the SGIP.¹ These arguments are flawed, unsupported, and outside the scope of the Draft Decision, and thus should be rejected.

As noted by the Draft Decision, the system size cap is in place for numerous reasons, including the need to preserve program funding for more participants and adherence to the program requirement that systems be designed to serve the customer's onsite load. If the size cap is lifted, the incentive program budget may be exhausted by only a few participants. These goals, among the others mentioned in the Draft Decision, necessitate a system size cap.

Further, the Commission should not consider requiring utilities to provide "additional compensation" to solar system owners.² There is no evidence in this proceeding to allow the Commission to take such action. The Commission has not yet reviewed the costs and benefits of existing incentives and subsidies. Nor has the Commission reviewed the specific "costs and benefits of net metering to customer-generators, ratepayers, and the utilities, including any beneficial and adverse effects on public benefit programs and special purpose surcharges" as required by Public Utilities Code Section 2827(n). Additionally, there are questions regarding the extent of the Commission's authority to set pricing and/or order payment for energy delivered to the grid. Until the Commission has performed the necessary cost-benefit reviews

¹ Interestingly, CARE points to the feed-in tariff adopted in Germany as a model for such "compensation." It is worth noting, however, that Germany does not provide incentives to encourage the installation of the solar energy systems or net energy metering. Customers participating in Germany's program do not serve onsite load with the generation produced – rather, all generation is sold to the utilities at a certain rate. In contrast, California's program provides an incentive to induce installation, as well as ongoing subsidies through the NEM program which compensate customers at a much higher rate than payments for the avoided cost of the energy exported.

² Although unclear, the apparent premise on which CARE bases this argument is incorrect. CARE states that the utilities "have refused to enter into [PPAs] with their residential and small business customers." This is false. SCE will enter into a PPA with customers who have installed generators sized 100 kW or smaller if those generators are certified as Qualifying Facilities under the Public Utilities Regulatory Policy Act of 1978.

and has addressed foundational jurisdictional issues, the Commission should not consider additional “compensation” proposed for solar system owners.

Respectfully submitted,

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By: Amber E. Dean

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July 17, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON OPINION MODIFYING DECISION 06-01-024 TO INCREASE SYSTEM SIZE ELIGIBILITY on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.

First class mail will be used if electronic service cannot be effectuated.

Executed this **17th day of July, 2006**, at Rosemead, California.

/s/VICKI CARR_DONERSON

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